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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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M 09 021

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(T. 18 U.S.C. § 2113(a))

RASHEED FREEMAN,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

BARBARA DALY, being duly sworn, deposes and states that she is a Special Agent with the Federal Bureau of Investigation ("FBI"), duly appointed according to law and acting as such.

Upon information and belief, on or about January 9, 2009, within the Eastern District of New York, the defendant RASHEED FREEMAN did knowingly, intentionally take by force, violence and intimidation, from the person and presence of another, money belonging to and in the care, custody, control, management and possession of a bank or other financial institution, to wit: TD Bank, the deposits of which are insured by the Federal Deposit Insurance Corporation.

(Title 18, United State Code, Section 2113(a))

The source of your deponent's information and the grounds for her belief are as follows:¹

¹ Because this affidavit is being submitted for the limited purpose of establishing probable cause to arrest the

1. I am familiar with the facts contained in this affidavit as a result of my participation in the investigation of the bank robbery discussed in this affidavit, which includes, but is not limited to, my review of bank robbery surveillance photographs and conversations with other law enforcement personnel assisting with the investigation.

2. On or about January 9, 2009, the defendant RASHEED FREEMAN robbed TD Bank, located at 188-02 Hillside Avenue, Queens, New York, at the corner of 188th Street.

3. Specifically, the defendant entered the bank at approximately 5:48 p.m. wearing a light blue jacket with stripes on both arms over a dark hooded sweatshirt, with the hood up, and a black scarf. Immediately after entering the bank, the defendant tied the scarf over his face and drew a black semiautomatic handgun.

4. The defendant then approached a bank teller ("Teller #1") who was not protected by a bandit barrier. The defendant pointed the gun at Teller #1 and instructed Teller #1 to place money in a black plastic bag that he handed across the teller counter. Teller #1 placed money and a red dye pack in the bag.

defendant, I have not included details of every aspect of this investigation.

5. While Teller #1 was placing money in the bag, the defendant pointed the gun at a second teller ("Teller #2") and instructed that teller to place money in the bag as well. Teller #2 placed money and a red dye pack in the bag. Teller #1 then handed the bag to the defendant. In total, Teller #1 and Teller #2 placed \$5,732 into the bag.

5. Teller #1 described the defendant as a black man approximately six feet tall. Teller #2 described the defendant as a black man approximately six feet and five inches tall.

6. At approximately 5:49 p.m. the defendant left the bank. After the defendant left the bank, Teller #1 activated the bank's alarm system, which notified the New York City Police Department ("NYPD") that a robbery had taken place.


7. Shortly thereafter, NYPD officers in an unmarked car observed the defendant walking on Carpenter Avenue, less than one mile from the bank. The defendant is a black man who is six feet and four inches tall. He was wearing a green sweater and no jacket.

8. The officers pulled up facing the defendant and flashed a light at him. The officers observed that the defendant was sweating profusely. The defendant ran away from the officers. The officers got out of their car, followed the defendant and apprehended him in front of 195-27 Carpenter Avenue at approximately 6:15 p.m.

9. When he was apprehended, the defendant was carrying a black plastic bag that contained money stained with red dye. The defendants' hands were also stained with red dye.

10. Officers recovered a light blue jacket with stripes on one or both arms and a black hooded sweatshirt on the southeast corner of 188th Street and 89th Avenue. The sweatshirt was stained with red dye. Officers also recovered money stained with red dye from the same location.

WHEREFORE, your deponent respectfully requests that the defendant RASHEED FREEMAN be dealt with according to law.



BARBARA DALY
Special Agent
Federal Bureau of Investigation

Sworn to before me this
10th day of January 2009



UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK